

UNITED STATES DISTRICT COURT

for the

District of Oregon

United States of America

v.

YOSEL JOSUE RODRIGUEZ PAZ,

Defendant(s)

Case No. 3:23-mj-00208

SEALED**CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 7, 2023 in the county of Multnomah and elsewhere in the
District of Oregon, the defendant(s) violated:*Code Section**Offense Description*

21 U.S.C. §§ 841(a)(1), (b)(1)(B)(vi)

Possession with Intent to Distribute Controlled Substances (40 grams or more of a mixture or substance containing a detectable amount of fentanyl)

This criminal complaint is based on these facts:

See affidavit of DEA Task Force Officer Alexander Salisbury which is attached and incorporated fully by reference

☒ Continued on the attached sheet.

/s/ Signed by Telephone

Complainant's signature

Alexander Salisbury, DEA Task Force Officer

*Printed name and title*Sworn to by telephone or other reliable means at 3:45 a.m./p.m. in accordance with Fed. R. Crim. P. 4.1Date: 12/07/2023City and state: Portland, Oregon*Stacie Beckerman*
Judge's signature

STACIE F. BECKERMAN, U.S. Magistrate Judge

Printed name and title

SEALED 3:23-mj-00208

DISTRICT OF OREGON, ss:

AFFIDAVIT OF COREY SHANNAHAN

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, Alexander Salisbury being duly sworn, do hereby depose and state as follows:

Introduction and Detective Background

1. I am a Sherwood Police Department Detective Alexander Salisbury, currently hold the rank of Detective and am assigned as a Task Force Officer (TFO) to the Portland Drug Enforcement Administration (DEA) Portland Office Group D-51. Prior to my assignment as a TFO, I spent three (3) years as a Detective in the Sherwood Police Department Investigations Unit. I have received over 1,690 hours of training as documented by the Department of Public Safety Standards and Training (DPSST). I hold a Bachelor of Arts in History from George Fox University, an MBA from the University of Scranton, and a Graduate Certificate in Homeland Security from The Pennsylvania State University. I have received specialized training in the area of narcotics investigations including; narcotics identification, surveillance techniques, handling and packaging of evidence, and testing of suspected controlled substances by scientifically accepted methods. This training has been provided to me by DPSST, the DEA, and in-service training through the Sherwood Police Department. Included in my training and experience, I have training specific to the identification and investigation of people involved in the use, sale, manufacturing and/or delivery of controlled substances including, but not limited to, methamphetamine, cocaine, marijuana, MDMA, heroin, fentanyl and other controlled substances.

2. I have had numerous conversations with individuals involved in the illegal distribution, possession, trafficking and manufacturing of controlled substances and have become familiar with their methods of operation. I am familiar with investigations of drug trafficking

organizations (DTOs), including methods of importation and distribution of controlled substances. The information set forth below is based on information and/or on conversations I have had with other law enforcement officers.

3. I submit this affidavit in support of a criminal complaint and arrest warrant for YOSEL JOSUE RODRIGUEZ PAZ (“**RODRIGUEZ**”) for violations of Title 21, United States Code, Sections 841(a)(1), Possession with Intent to Distribute Controlled Substances (fentanyl).

4. This affidavit is intended only to show that there is sufficient probable cause for the requested arrest warrant and does not set forth all of my knowledge about this matter. The facts set forth in this affidavit are based on my own personal knowledge, knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers, interviews of witnesses, a review of records related to this investigation, communications with others who have knowledge of the events and circumstances described herein, and information gained through my training and experience.

Applicable Law

5. Title 21, United States Code, Section 841(a)(1), and (b)(1)(B)(vi) makes it illegal to possess with the intent to distribute a controlled substance, including at least 40 grams but not more than 399 grams of a substance or mixture containing a detectable amount of fentanyl, or to conspire to do so. Based on the facts from this investigation, these offenses carry a maximum sentence of 5-40 years’ imprisonment, a fine of up to \$5 million, and a four-year term of supervised release.

Sources of Information

6. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Statement of Probable Cause
Background of the Investigation

8. Agents and officers comprising the Drug Enforcement Administration, Homeland Security Investigations, Tigard Police Department, Washington County Sheriff's Office, and Sherwood Police Department assigned to Drug Enforcement Administration led federal task force D-51, ("Investigators") have been investigating a trend of Drug Trafficking Organizations (DTOs) using Honduran nationals to distribute bulk amounts of fentanyl to retail drug customers in several metropolitan areas in the western United States to include Portland, Oregon; Seattle, Washington; Oakland, California; Denver, Colorado; and Salt Lake City, Utah.

9. From September to November 2023, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Investigators subsequently purchased 276.0 gross grams of fentanyl from **RODRIGUEZ** during a controlled purchase occurring in October 2023.

October 2023: Investigators obtain geolocation for RODRIGUEZ's Phone

10. Investigators applied for a federal search warrant for Rodriguez's cellphone geolocation data. On October 11, 2023, U.S. Magistrate Judge Stacie Beckerman authorized the warrant. (filed in 3:23-mc-881 A-B). Investigators used the geolocation data from the phone to locate the residence of **RODRIGUEZ** as 18181 SE Arista Dr., Unit 15 Milwaukie, OR. Investigators then displayed surveillance photographs of **RODRIGUEZ** departing the 18181 SE Arista Dr residence to CS-1. Upon review, CS-1 identified **RODRIGUEZ** as the user of SP-2239 who had sold CS-1 276.0 gross grams of fentanyl during October 2023.

November 7, 2023: Investigators Search RODRIGUEZ's Residence and Seize Distributable Quantities of Controlled Substances and Drug Proceeds

11. On November 6, 2023, the honorable U.S. Magistrate Judge Stacie Beckerman signed a search warrant (filed in 3:23-mc-00960-A) authorizing the search of 18181 SE Arista Dr., unit 15 Milwaukie, OR an apartment in the Colony Square Apartments where **RODRIGUEZ** lived.

12. On November 7, 2023, Investigators served the search warrant on 18181 SE Arista Dr., Unit 15 Milwaukie, OR. During the execution of the search warrant, **RODRIGUEZ**

was detained without incident while Investigators conducted their search of the premises.

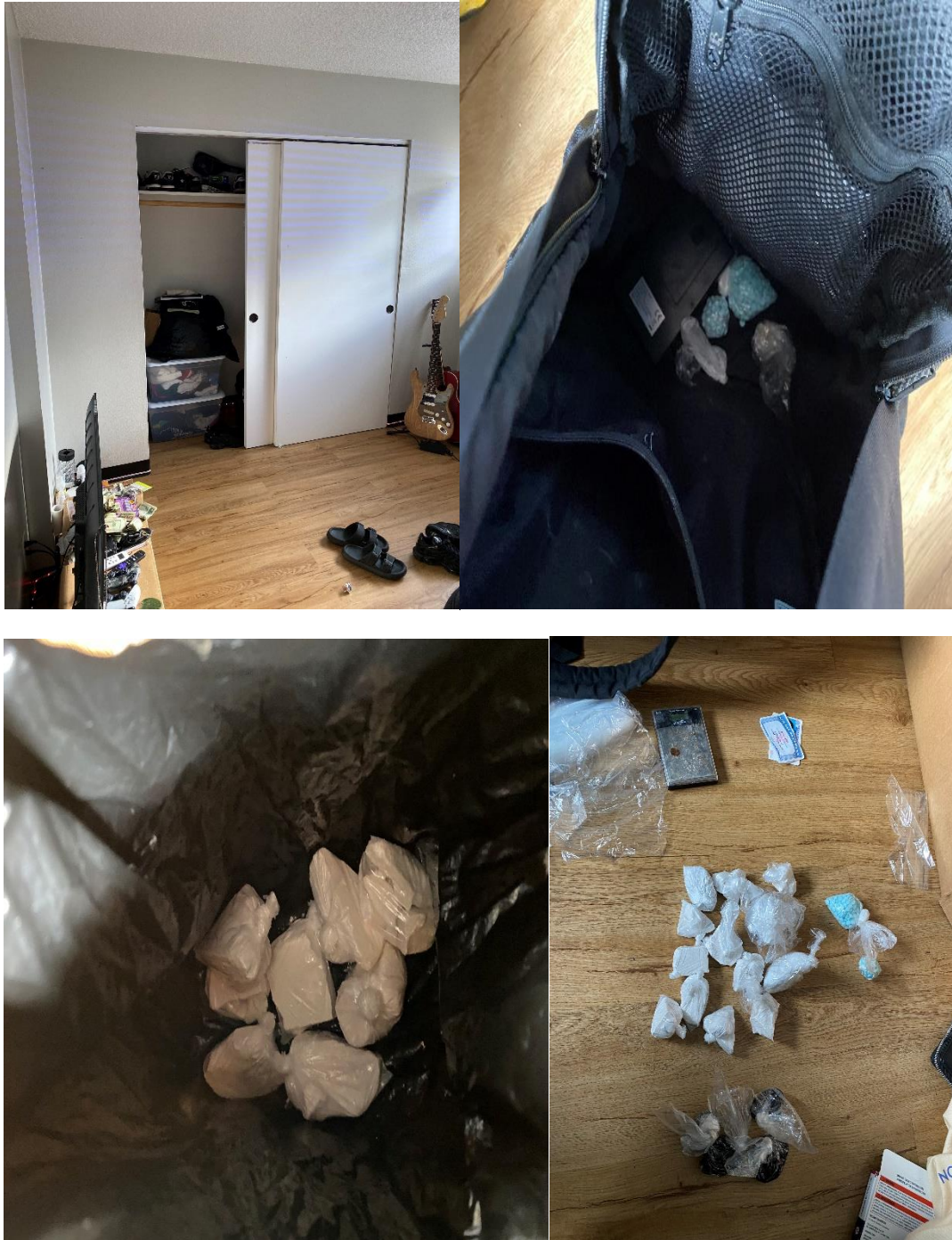
Investigators searched the room, where they initially found **RODRIGUEZ**, and located the following controlled substances:

- 446.2 grams of powdered fentanyl,
- 97.4 grams of blue fentanyl pills, and
- 121.5 grams of heroin inside of the room.

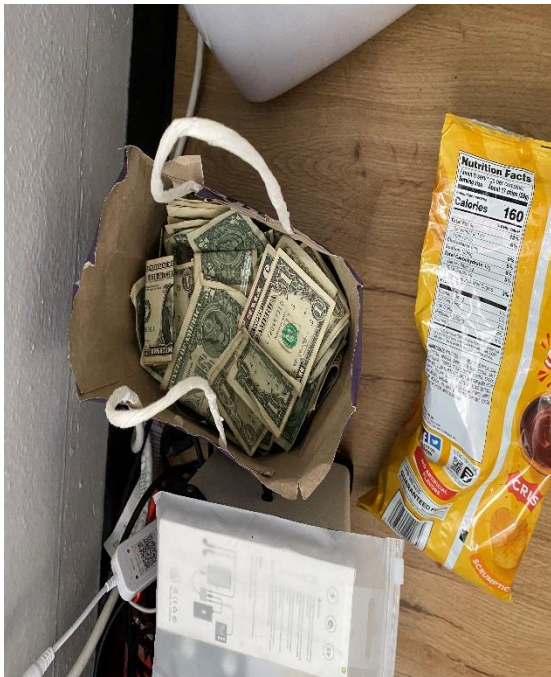
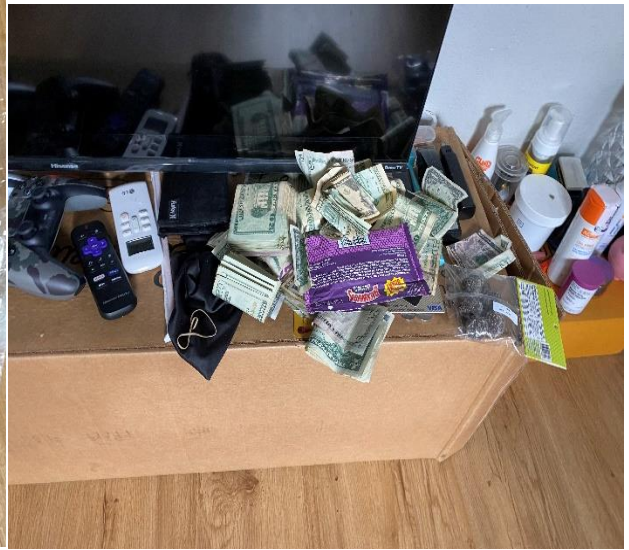
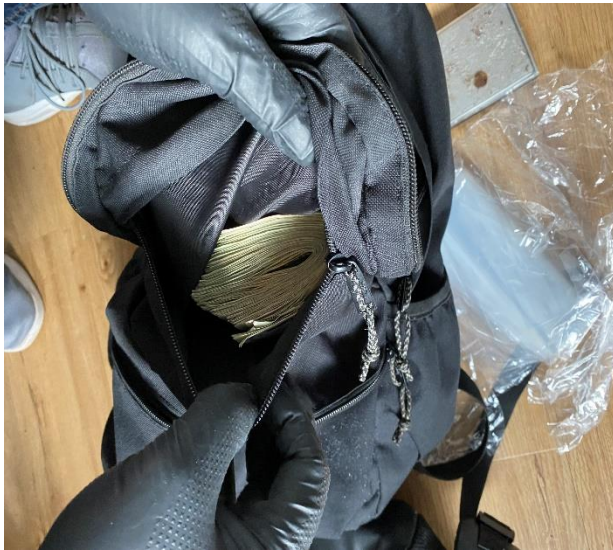
Investigators located the drugs inside a black bag in the closet of the room where investigators initially encountered **RODRIGUEZ** during service of the search warrant. Investigators noted that the powdered fentanyl, fentanyl pills, and heroin were all individually wrapped as if they were ready to be sold to customers. SA Shannahan also located \$6,160 in U.S. currency inside a bag, a shoebox, and on an entertainment center in the room belonging to **RODRIGUEZ**.

Multiple phones were located inside the residence. The phone belonging to **RODRIGUEZ** for which the geolocation data was used was not located, though software to monitor the geolocation data indicated the phone was at the residence during the service of the premises warrant.

13. Below are images taken during the search warrant that depict the closet where the black bag was found, the black bag containing controlled substances, the bulk fentanyl pills and powder packaged for distribution, and case investigators believe to be drug proceeds:



*Pictured above: closet in **Rodriguez's** bedroom where black bag containing drugs was found and black bag containing drugs.*



*Pictured above: drug proceeds found throughout **Rodriguez's** bedroom.*

14. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Conclusion

15. Based on the investigation, the evidence and **RODRIGUEZ's** own admissions, I believe **RODRIGUEZ** was involved in trafficking distributable amounts of fentanyl and heroin in the Portland, Oregon area. Specifically, I believe that **RODRIGUEZ** was distributing or intended to distribute the following narcotics:

- 276.0 gross grams of fentanyl pills during a controlled purchase [REDACTED]
- 543.6 gross grams of fentanyl pills and powder found at the Arista Drive residence
- 121.5 gross grams of heroin found at the Arista Drive residence

16. Prior to being submitted to the Court, this affidavit, the accompanying complaint and the arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Paul Maloney, and AUSA Maloney advised me that in his opinion the affidavit and complaint are legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrant

Request for Sealing

17. It is respectfully requested that the Court issue an order sealing, until further order of the Court, all papers submitted in support of the requested criminal complaint and arrest warrant. I believe that sealing these documents is necessary because the information to be seized is relevant to an ongoing investigation, and any disclosure of the information at this time is likely

to seriously jeopardize the ongoing investigation. Premature disclosure of the affidavit, the criminal complaint, and the arrest warrant may adversely affect the integrity of the investigation.

/s/ Sworn to by telephone

In accordance with Fed. R. Crim. P. 4.1

Alexander Salisbury
TFO Alexander Salisbury

Sworn to by telephone or other reliable means accordance with Fed. R. Crim. P. 4.1.

at 3:45 a.m./p.m. this 7th day of December __, 2023.



HONORABLE STACIE F. BECKERMAN
United States Magistrate Judge